

PFE ORIGINAL

POLREP 03
12th Street Dump Site
(aka 12th Street Landfill Site)
near 12th Street Ramp to I-495
Wilmington, Delaware 19802



ATTN: RRC
cc: A. Breslin (DNREC)
Wilmington Council
P. Welsh (DELDOT)

I. SITUATION (as of 4 April 2000)
EVENT: Initiation of Removal Action

A. The OSC initiated removal activities at the Site with a meeting involving cleanup and technical assistance contractors as well as representatives from DNREC and DELDOT on 3 April 2000. The EPA contractors which will conduct upcoming activities include: Guardian Environmental Services of Bear, Delaware (Guardian), which will conduct cleanup related activities; Weston, which will prepare an Erosion and Sedimentation Control Plan and related engineering activities; and Stevens Environmental which will conduct a topographic survey as a subcontractor to Weston.

B. The OSC arranged for continued access to the Site by coordination with the State of Delaware (DELDOT) and by extending the right-of-entry agreement with Norfolk and Southern until May 1, 2000. The City of Wilmington continues to provide access to the contaminated parcel. Additional access related concerns must still be accomplished with adjacent land owners and adjacent leasees to improve the ability for cleanup contractors to complete removal actions. Additionally, the scope of access with Norfolk and Southern needs to be expanded to accommodate Removal Actions. However, current access limitations are suitable for implementation of upcoming removal activities.

C. The Action Memorandum establishes an Estimated Total Project Ceiling of \$1,983,000. The proposed distribution of funding is as follows:

SOURCE	CEILING
ERRS	\$1,623,000
SATA	\$ 120,000
EPA	\$ 240,000
TOTAL	\$1,983,000

II. ACTIONS

A. The OSC initiated a Removal Action at the 12th Street Landfill/Dump Site on 3 April

ENFORCEMENT CONFIDENTIAL

ENFORCEMENT CONFIDENTIAL

2000. A tentative start date for onsite activities is set for 5 April 2000 pending renewal of right-of-entry agreements with Norfolk and Southern allowing personnel and vehicle traffic over the active siding and verification of appropriate requirements contained in the right-of-entry agreement. The OSC signed the new right-of-entry on 4 April 2000. The contaminated parcel can only be accessed through land owned/controlled by State of Delaware and by crossing the Norfolk and Southern railroad tracks.

B. The OSC coordinated likely future needs involving activities on property controlled by DELDOT with DELDOT personnel. DELDOT and EPA will continue coordination efforts and the OSC will better define needs once access corridor is established.

C. On 3 April 2000, The OSC and DNREC personnel communicated with an adjacent business owner regarding access impediments created by business assets staged between the Site and the 12th Street Right-of-Way. Agreement was reached regarding the movement of materials to create a corridor through which EPA may access the Site from the 12th Street public roadway after security fencing enclosing the assets is relocated. Activities will need to be coordinated with Norfolk and Southern and the State of Delaware (through DELDOT) which own or control real property in this corridor area. Ideally, this corridor will be used for primary access to and from the Site while the existing access through the railroad property and over the tracks is maintained for a secondary entryway. The OSC will continue to coordinate with business owners, DELDOT, and Norfolk and Southern to establish a suitable corridor of entry to the Site.

D. On 3 April 2000, EPA and DNREC discussed activities which may occur prior to completion of a Site Erosion and Sedimentation Control Plan (E&S Plan). Weston is now preparing the E&S Plan, but a detailed survey and topographic map is needed to complete the E&S Plan. Guardian is directed to clear vegetation from the Site to facilitate Removal activities. The clearing of vegetation will enable completion of a suitable elevation survey needed for the E&S Plan. The survey will be conducted by Stevens Environmental (a subcontractor to Weston). In the absence of an approved E&S Plan, clearing activities will be limited to removal of vegetation and tree topping without disturbance of the soil. Any cleared area which exposes bare soil will be mulched.

E. On 4 April 2000, analytical data derived from toxicity tests conducted on Site soils was received and evaluated. The analytical data indicate that a significant difference exists between the survival rate of organisms in control soils (93%) and Site soils with elevated contaminant levels (72%). The survival rate of organisms in uncontaminated soils at the Site was 83%. The analytical data will be discussed with DNREC and Federal Natural Resource Trustee agencies and considered in the selection and implementation of activities intended to cover contaminants left on the Site.

III. FUTURE ACTIONS

A. Initiate field activity 5 April 2000.

B. Communicate Site actions to the City of Wilmington.

- C. Continue actions needed to improve access to contaminated property in order to conduct an efficient Removal Action. Conduct meeting 7 April 2000 regarding creation of an access corridor from 12th Street to the Site.
- D. Complete an Erosion and Sedimentation Control Plan to guide removal activities in general compliance with erosion and sedimentation control requirements of DNREC.
- E. Select an appropriate control (e.g., coffer dam) to isolate the Site from the Brandywine Creek to minimize erosion of contaminants and soil into the Creek during Removal Action.
- F. Evaluate placement of fencing around the contaminated area to minimize access by trespassers to contaminated area and provide security for future removal activities. Fenced area will be posted to notify trespassers that the area should not be entered.
- G. Conduct a meeting with federal and state trustee and environmental agencies to evaluate cover materials and discuss practical actions necessary to implement the Removal Action in compliance with erosion and sedimentation requirements of the State of Delaware.
- H. Evaluate Applicable or Relevant and Appropriate Requirements (ARARs) recently identified by DNREC and integrate into removal strategy.
- I. Coordinate with local and state officials and adjacent businesses.

Michael Towle, OSC
EPA Region III
Philadelphia, PA 19103